

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Case No. 1:23-CV-878-TDS-JEP**

DEMOCRACY NORTH CAROLINA, et
al.

Plaintiffs,

v.

ALAN HIRSCH, *et al.*,

Defendants,

and

DESTIN C. HALL, *et al.*,

Intervenor- Defendants.

**STATE BOARD DEFENDANTS’
MEMORANDUM OF LAW**

**Fed. R. Civ. P. 56 &
L. Civ. R. 7.3(a) and 56.1**

NOW COME Defendants Alan Hirsch, Jeff Carmon, Stacy Eggers, IV, Kevin N. Lewis, Siobhan O’Duffy Millen and Karen Brinson Bell, in their official capacities (collectively, the “State Board Defendants”), through undersigned counsel, to provide this Memorandum of Law in support of State Board Defendants’ Motion for Summary Judgment. As noted in State Board Defendants’ Motion for Summary Judgment, filed herewith, State Board Defendants hereby rely on Legislative Defendants’ memorandum of law. [D.E. 120].

For the reasons stated therein, this Court should grant summary judgment in favor of Defendants.

Respectfully submitted this the 11th day of April, 2025.

NORTH CAROLINA
DEPARTMENT OF JUSTICE

/s/ Terence Steed

Terence Steed
Special Deputy Attorney General
N.C. State Bar No. 52809
E-mail: tsteed@ncdoj.gov

North Carolina Department of Justice
Post Office Box 629
Raleigh, North Carolina 27602
Telephone: (919) 716-6567

Counsel for State Board Defendants

CERTIFICATE OF WORD COUNT

I hereby certify that pursuant to Local Rule 7.3(d)(1), the foregoing has a word count of less than 6,250 words not including the caption, signature block, and certification of word count. This document was prepared in Microsoft Word, from which the word count is generated.

Dated this 11th day of April, 2025.

/s/ Terence Steed
Terence Steed
Special Deputy Attorney General